MORINITED STATES. JOHN AGENCY, AND PROTECTION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2 290 BROADWAY NEW YORK, NY 10007-1866

February 1, 2022

URGENT LEGAL MATTER PROMPT REPLY NECESSARY VIA OVERNIGHT MAIL

[See Attached List of Addressees]

Re: Request for Information Pursuant to Section 104(e) of the Comprehensive Environmental

Response, Compensation, and Liability Act, 42 U.S.C. § 9604(e)

Brillo Landfill Superfund Site, Town of Victory, Cayuga County, New York

Dear Madam or Sir:

The United States Environmental Protection Agency ("EPA") is charged with responding to releases or threatened releases of hazardous substances, pollutants, and/or contaminants into the environment, and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. §§ 9601-9675 ("CERCLA"), also known as the "Superfund" law. For your information, a copy of the Superfund law may be found at www.epa.gov/superfund.

EPA has documented the release or threatened release of hazardous substances into the environment at the Brillo Landfill Superfund Site ("the Site"), which is located on the north side of New York Route 370 (NY-370) near the intersection of Conquest Victory Town Line Road (NY-129) and NY-370, and further described on Cayuga County tax map as parcel No. 44.00-1-42.1, in the Town of Victory, Cayuga County, New York. In response to these releases and threatened releases, EPA performed a removal action at the Site. In 2018 and 2019, EPA spent public funds, pursuant to its authority under CERCLA, to remove more than 2,000 drums from the Site, many of which contained CERCLA hazardous substances.

The Site is the location of an inactive landfill, approximately 113 acres in size, known as the Brillo Landfill ("Landfill"). Joseph P. Brillo, doing business under various company names, was a transporter of wastes, including chemical and liquid wastes to the Site and operated the Landfill from approximately the early 1960s until the late 1980s. EPA has reason to believe that one or more containers with your company's name on them were disposed of at the Site and/or EPA has records indicating your company did business with the owner/operator of the Site.

REQUEST FOR INFORMATION

This letter seeks your cooperation in providing information and documents relating to the contamination of the Site. We encourage you to give this matter your immediate attention. You should provide a complete and truthful response to the enclosed Request for Information within 30 calendar days of your receipt of this letter.

Under Section 104(e)(2) of CERCLA, 42 U.S.C. § 9604(e)(2), EPA has broad information gathering authority to require persons to provide the following: information and/or documents relating to materials generated, treated, stored, or disposed of at, or transported to a facility; the nature or extent of a release or threatened release of a hazardous substance, pollutant, or contaminant at or from a facility; and the ability of a person to pay for or perform a cleanup.

While EPA seeks your cooperation in this investigation, your compliance with the Request for Information is required by law. In preparing your response to this Request for Information, please follow the enclosed Instructions.

When you have prepared your response to the Request for Information, please sign and have notarized the enclosed "Certification of Answers to Request for Information," and return and/or scan and email that Certification to EPA along with your response. Please note that false, fictitious, or fraudulent statements or representations may subject you to civil or criminal penalties under federal law. In addition, Section 104 of CERCLA, 42 U.S.C. § 9604, authorizes EPA to pursue penalties for failure to comply with the Request for Information.

Some of the information EPA is requesting may be considered by you to be confidential business information. Please be aware that you may not withhold the information on that basis. If you wish EPA to treat all or part of the information confidentially, you must advise EPA of that fact by following the procedures described in the enclosed Instructions, including the requirement of supporting your claim of confidentiality.

If you have information about other parties who may have information that may assist EPA in its investigation of the Site, or may be responsible for the material stored or disposed of at the Site, that information should be submitted within the time frame noted above. Please note that if after submitting your response you obtain additional or different information concerning the matters addressed by the Request for Information, you must promptly notify EPA and turn over the additional or different information to EPA.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §§ 3501-3520.

Your response to this Request for Information, which we encourage you to submit electronically, should be sent to the following:

Ricky C. Ng Assistant Regional Counsel New York/Caribbean Superfund Branch Office of Regional Counsel
U.S. Environmental Protection Agency, Region 2
290 Broadway, 17th Floor
New York, NY 10007-1866
ng.ricky@epa.gov

and to:

Irmgard Lopez
On-Scene Coordinator/Enforcement Specialist
U.S. Environmental Protection Agency, Region 2
2890 Woodbridge Avenue
Building 205, MS-211
Edison, NJ 08837
Lopez.Irmgard@epa.gov

If you have any technical questions regarding this letter, you may call Ms. Lopez at (732) 906-6813 or email her at the email address listed above. Please direct all inquiries from an attorney to Mr. Ng at (212) 637-3151 or at the email address listed above.

We appreciate your attention to this matter and look forward to your prompt response to this letter.

Sincerely yours,

ERIC Digitally signed by ERIC WILSON

WILSON Date: 2022.02.01 08:10:16

Eric J. Wilson

Deputy Director for Enforcement and Homeland Security Superfund and Emergency Management Division

Enclosure

List of Addressees for Brillo Landfill Superfund Site Request for Information

Anthony O'Donovan, President and CEO Arkema Inc. (fka M&T Chemicals, Inc., Pennsalt Chemicals Corporation, and R.H. Miller Company) 900 First Ave King of Prussia, PA 19406 Arkema Inc. Corporation Service Company, Registered Agent 80 State Street Albany, NY 12207-2543	President Auburn Technology, Inc. (fka White Industrial Power, Inc. dba ALCO) c/o Alstom USA Inc. 641 Lexington Avenue, 28 th Floor New York, NY 10022 Auburn Technology, Inc. C T Corporation System, Registered Agent 28 Liberty Street New York, NY 10005
Thomas L. Williams, Chairman and CEO Byron Valve & Machine Corp. c/o Parker-Hannifin Corporation 6035 Parkland Boulevard Cleveland, OH 44124-4141 Parker-Hannifin Corporation C T Corporation System, Registered Agent 28 Liberty Street New York, NY 10005	Devanir Moraes, President and CEO Chem-Trend L.P. 1445 West McPherson Park Drive Howell, MI 48843
Michael D. Quill, Mayor City of Auburn (Auburn Waste Treatment Plant) 24 South Street Auburn, NY 13021	J. Ryan McMahon, II, County Executive County of Onondaga (Metropolitan Syracuse Wastewater and Wetzel Road Treatment Plants) John H. Mulroy Civic Center, 14th floor Syracuse, NY 13202
Mauro G. Gregorio, CEO Dow Silicones Corporation (fka Dow Corning Corporation) 2200 West Salzburg Road Midland, MI 48686 Dow Silicones Corporation C T Corporation System, Registered Agent 28 Liberty Street New York, NY 10005	Charles V. Magro, CEO E. I. du Pont de Nemours and Company 974 Centre Road Wilmington, DE 19805-1269 Mark E. Newman, President and CEO The Chemours Company (E.I. Du Pont de Nemours and Company) 1007 Market Street Wilmington, DE 19899
	E. I. du Pont de Nemours and Company C T Corporation System, Registered Agent 28 Liberty Street New York, NY 10005

H. Lawrence Culp, Jr., Chairman and CEO General Electric Company 5 Necco Street Boston, MA 02210	Darius E. Adamczyk, Chairman and CEO Honeywell International Inc. (fka Allied Chemical Corporation) 101 Columbia Road Morristown, NJ 07960 Honeywell International Inc.
	Corporation Service Company, Registered Agent 80 State Street Albany, NY 12207-2543
Mark T. Smucker, President and CEO The J. M. Smucker Company (International Multifoods Corp., MIX Acquisition Corp., Smucker-IMC, Inc.) 1 Strawberry Lane Orrville, OH 44667-1241	President Lenox Corporation (Oneida Ltd., Oneida Consumer, LLC) 1414 Radcliffe Street, Fl 1 Bristol, PA 19007-5496
Smucker-IMC, Inc. C T Corporation System, Registered Agent 28 Liberty Street New York, NY 10005	Oneida Ltd. Corporation Service Company, Registered Agent 80 State Street Albany, NY 12207-2543
Mark Hillinger, President MacDermid, Incorporated (Kelite Corp., Kelite Products, Inc., Witco/Allied-Kelite) 245 Freight Street Waterbury, CT 06702-1818	President Miller Brewing Company 3939 West Highland Blvd Milwaukee, WI, 53208-2816 Miller Brewing Company
MacDermid, Incorporated Corporation Service Company, Registered Agent 80 State Street Albany, NY 12207-2543	C T Corporation System, Registered Agent 28 Liberty Street New York, NY 10005
Neil R. Ackerman, President Occidental Chemical Corporation (fka Diamond Chemicals Company) 14555 Dallas Parkway, Suite 400 Dallas, TX 75254	Machteld De Haan, President and CEO Pennzoil-Quaker State Company 150 North Dairy Ashford Road Houston, TX 77070
Occidental Chemical Corporation C T Corporation System, Registered Agent 28 Liberty Street New York, NY 10005	Pennzoil-Quaker State Company C T Corporation System, Registered Agent 28 Liberty Street New York, NY 10005

Presidents	Andry Tomotich Dragidant and CEO
	Andy Tometich, President and CEO
Pierce & Stevens Chemical Corp.	Quaker Chemical Corporation
Henkel Corp.	901 East Hector Street
710 Ohio Street	Conshohocken, PA 19428-2380
Buffalo, NY 14203	
	Quaker Chemical Corporation
Henkel of America, Inc.	Corporation Service Company, Registered
Corporation Service Company, Registered	Agent
Agent	80 State Street,
80 State Street,	Albany, NY 12207-2543
Albany, NY 12207-2543	
Michael O'Shaughnessy, President and CEO	Revitalizing Auto Communities
Revere Copper Products, Inc.	Environmental Response (RACER) Trust
1 Revere Park	(fka General Motors Corporation)
Rome, NY 13440-5561	1505 Woodward Avenue, Suite 200
	Detroit, MI 48226
Revere Copper Products, Inc.	,
C T Corporation System, Registered Agent	
28 Liberty Street	
New York, NY 10005	
Louis V. Pinkham, CEO	H. Fisk Johnson, Chairman and CEO
Rollway Bearing Corporation	S. C. Johnson & Son, Inc.
c/o Regal Rexnord Corporation	(fka Johnson's Wax)
200 State Street	1525 Howe St.
Beloit, WI 53511	Racine, WI 53403-2237
Beloft, W1 55511	Racine, W1 33403-2237
Rollway Bearing Corporation	S. C. Johnson & Son, Inc.
C T Corporation System, Registered Agent	Corporation Service Company, Registered
28 Liberty Street	
	Agent 80 State Street
New York, NY 10005	
Names Care Description	Albany, NY 12207-2543
Nancy Sax, President	Rafael Vassallo Collazo, President and CEO
Stan Sax Corp.	Vassallo International Group, Inc.
(fka J.J. Siefen Company)	(Syroco Inc.)
10900 Harper Avenue	100 Carr 506 Coto Laurel
Detroit, MI 48213	Ponce, PR 00780
	Syroco, Inc.
	C T Corporation System, Registered Agent
	28 Liberty Street
	New York, NY 10005
John Tierney, President	Welch Allyn, Inc.
Welch-Allyn, Inc.	C T Corporation System, Registered Agent
4341 State Street Road	28 Liberty Street
Skaneateles Falls, NY 13153	New York, NY 10005

REQUEST FOR INFORMATION INSTRUCTIONS Brillo Landfill Superfund Site

DIRECTIONS

- 1. <u>Answer Every Request Completely</u>. A separate response must be made to each of the requests set forth in this Request for Information. For each request, if information responsive to this Request for Information is not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained.
- 2. <u>Number Each Answer</u>. Precede each answer with the corresponding number of the request and the subpart to which it responds.
- 3. Provide the Best Information Available. Provide responses to the best of your ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees and/or agents. Submission of cursory responses when other responsive information is available to you will be considered non-compliance with this Request for Information. Whenever there is a request to identify a natural person or an entity in this Request for Information, state, among other things, the person or entity's full name, present or last known address, and any other contact information such as telephone number or email address.
- 4. <u>Identify Sources of Answers</u>. For each request, identify (see Definitions) all the persons and documents that you relied on in producing your answer.
- 5. <u>Inability to Answer or Provide Documents</u>. If you are unable to answer a request in a detailed and complete manner or if you are unable to provide any of the information or documents requested, indicate the reason for your inability to do so. If you have reason to believe that there is an individual who may be able to provide more detail or documentation in response to any request, state that person's name and last known address, telephone number, and email address and the reason for your belief.
- 6. <u>Documents</u>. If anything is deleted from a document produced in response to this Request for Information, state the reason for, and the subject matter of, the deletion. If a document is requested but is not available, state the reason for its unavailability.
- 7. Continuing Obligation to Provide and to Correct Information. If additional information or documents responsive to this Request for Information become known or available to you after you respond to this Request for Information, EPA hereby requests pursuant to Section 104(e) of CERCLA that you supplement your response to EPA. If after submitting your response, you discover that information you submitted is incorrect, it is necessary that you promptly notify EPA and correct such information.

- 8. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§ 9604(e)(7)(E) and (F). If you make a claim of confidentiality for any of the information you submit to EPA, you must separately address the following points:
 - a. the portions of the information alleged to be entitled to confidential treatment;
 - b. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
 - c. measures taken by you to guard against the undesired disclosure of the information to others;
 - d. the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
 - e. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
 - f. whether you assert that disclosure of the information would be likely to result in substantial harmful effect on your business's competitive position and, if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp or type "CONFIDENTIAL" on all responses and any related documents you assert to be confidential. Confidential portions of otherwise non-confidential documents should be clearly marked. You should indicate a date, if applicable, after which the information need no longer be treated as confidential. Please submit your response so that all non-confidential information, including any redacted versions of documents, are in one envelope (or electronic folder, as applicable) and all materials for which you desire confidential treatment are in another envelope (or electronic folder).

All confidentiality claims are subject to EPA review. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by Section 104(e)(7) of CERCLA and EPA's pre-disclosure notification procedures. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. EPA provides no assurances that all information that you assert as confidential business information will not be publicly disclosed. Any determination regarding public disclosure will be based on a review of the information and relevant countervailing factors.

DEFINITIONS

The following definitions shall apply to the following words insofar as they appear in this Request for Information.

- 1. The term "arrangement" means every separate contract or other agreement between two or more persons, whether written or oral.
- 2. The term "**commercial waste**" means any waste not within the definition of hazardous substance, hazardous waste, or industrial waste.
- 3. The term "Company" refers not only to your Company as set forth below but to its predecessor(s) and successor(s), as they were or currently are named and constituted, and all subsidiaries, divisions, affiliates, and branches, including but not limited to, those entities, if any, identified parenthetically below:
 - a. Arkema Inc. (M&T Chemicals, Inc.; Pennsalt Chemicals Corporation; R.H. Miller Company)
 - b. Auburn Technology, Inc. (White Industrial Power, Inc.; ALCO; Alstom USA Inc.)
 - c. Byron Valve & Machine Corp. (Parker-Hannifin Corporation)
 - d. Chem-Trend L.P.
 - e. City of Auburn (Auburn Waste Treatment Plant)
 - f. County of Onondaga (Metropolitan Syracuse Wastewater Treatment Plant; Wetzel Road Treatment Plant)
 - g. Dow Silicones Corporation (Dow Corning Corporation)
 - h. E. I. du Pont de Nemours and Company (DuPont Company) Chemours Company)
 - i. General Electric Company
 - j. Honeywell International Inc. (Allied Chemical Corporation)
 - k. The J. M. Smucker Company (International Multifoods Corp.; MIX Acquisition Corp.; Smucker-IMC, Inc.)
 - 1. Lenox Corporation (Oneida Ltd.; Oneida Consumer, LLC)
 - m. MacDermid, Incorporated (Kelite Corporation; Kelite Products, Inc.; Witco/Allied-Kelite)
 - n. Miller Brewing Company
 - o. Occidental Chemical Corporation (Diamond Chemicals Company)
 - p. Pennzoil-Quaker State Company
 - q. Pierce & Stevens Chemical Corp. (Henkel Corp.; Henkel of America, Inc.)
 - r. Quaker Chemical Corporation (Quaker Houghton)
 - s. Revere Copper Products, Inc.
 - t. Revitalizing Auto Communities Environmental Response (RACER) Trust (General Motors Corporation)
 - u. Rollway Bearing Corporation (Regal Rexnord Corporation)
 - v. S. C. Johnson & Son, Inc. (Johnson's Wax)
 - w. Stan Sax Corp. (J.J. Siefen Company)
 - x. Syroco Inc. (Vassallo International Group, Inc.)
 - y. Welch-Allyn, Inc.

- 4. The term "disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any hazardous substance, hazardous waste, industrial waste, or commercial waste into or on any land or water so that such hazardous substance, hazardous waste, industrial waste, and/or commercial waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including groundwater.
- 5. The term "documents" includes any written, recorded, computer-generated, visually, or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.
- 6. The term "entity" or "entities" refers to persons, companies, partnerships, or any other type of business association.
- 7. The term "Facility" or "Facilities" shall mean the location of any property owned, operated, or occupied by your Company, within a 100-mile radius of the Site or within New York State, which generated, handled, transported, treated, stored, or disposed of hazardous substances, hazardous wastes, industrial wastes, or commercial wastes.
- 8. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances. The substances that have been designated as hazardous substances pursuant to Section 102(a) of CERCLA, 42 U.S.C. § 9602(a), (which, in turn, comprise a portion of the substances that fall within the definition of "hazardous substance" under Section 101(14) of CERCLA) are set forth at 40 C.F.R. Part 302.
- 9. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of the Resource Conservation and Recovery Act, as amended ("RCRA"), 42 U.S.C. § 6903(5).
- 10. The term "identify" means, with respect to a natural person, to set forth the person's full name, present or last known employer, business address, email address, and business telephone number, as well as the present or last known home address and home telephone number. With respect to a corporation, partnership, or other business entity (including a sole proprietorship), the term "identify" means to provide its full name, address, telephone number, email address, and any affiliation or contractual relationship it has with the individual and/or Company to whom/which this Request for Information is addressed.
- 11. The term "**industrial waste**" shall mean any solid, liquid, or sludge or any mixtures thereof that possess <u>any</u> of the following characteristics:

- a. it contains one or more "hazardous substances" (at any concentration) as defined in Section 101(14) of CERCLA;
- b. it is a "hazardous waste" as defined in Section 1004(5) of RCRA;
- c. it has a pH less than 2.0 or greater than 12.5;
- d. it reacts violently when mixed with water;
- e. it generates toxic gases when mixed with water;
- f. it easily ignites or explodes;
- g. it is an industrial waste product;
- h. it is radioactive;
- i. it is an industrial treatment plant sludge or supernatant;
- j. it is an industrial byproduct having some market value;
- k. it is coolant water or blowdown waste from a coolant system;
- 1. it is a spent product that could be reused after rehabilitation; or
- m. it is any material that you have reason to believe would be toxic if either ingested, inhaled, or placed in contact with skin.
- 12. The term "person" shall have the same definition as that contained in Section 101(21) of CERCLA, and includes any individual, firm, unincorporated association, partnership, corporation, trust, consortium, joint venture, United States Government, State, municipality, commission, political subdivision of a State, any interstate body, or other entity.
- 13. The term "release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
- 14. The term "**Site**" shall mean the Brillo Landfill Superfund Site, including the real property located at the north side of New York Route 370 (NY-370) near the intersection of Conquest Victory Town Line Road (NY-129), and further described on Cayuga County tax map as ID No. 44.00-1-42.1, in the Town of Victory, Cayuga County, New York.
- 15. The term "treatment" or "treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous substance, hazardous waste, industrial waste, or commercial waste so as to neutralize such hazardous substance, hazardous waste, industrial waste, or commercial waste or so as to render such hazardous substance, hazardous waste, industrial waste, or commercial waste nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a hazardous substance, hazardous waste, industrial waste, or commercial waste so as to render it nonhazardous.

- 16. The term "waste transporter" shall mean any person who picked up any hazardous substance, hazardous waste, industrial waste, or commercial waste from a Facility or who otherwise transported any hazardous substance, hazardous waste, industrial waste, or commercial waste away from a Facility.
- 17. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA or RCRA, in which case the statutory definitions shall apply.

REQUEST FOR INFORMATION Brillo Landfill Superfund Site

- 1. State the full legal name and mailing address of the Company.
- 2. State the name(s), address(es), telephone number(s), and email address(es) of the President, Chief Executive Officer, and the Chairman of the Board (or other presiding officer) of the Company.
- 3. Provide the state and date of incorporation of the Company, as well as the date of qualification to do business in the State of New York, if applicable.
- 4. Provide the name, address, telephone number, and email address of the Company's agents for service of process in the state of incorporation and in the State of New York, if applicable.
- 5. State the corporate history of the Company including all name changes, mergers, acquisitions, bankruptcies, dissolutions, and spin-offs. In answering this request, please include the following:
 - a. List all names under which the Company operated between 1960 and 1990 including any trade or fictitious names, unincorporated divisions, or other operating units.
 - b. For each name identified, state whether it continues to exist as part of the Company and in what form.
 - c. If the name does not exist, provide the date and means by which it ceased to exist (e.g., name change, dissolution, bankruptcy, sale).
- 6. State whether the Company is a subsidiary of another company and, if so, identify all such corporate parent(s) and include the following additional information:
 - a. The name(s), address(es), telephone number(s), and email address(es) of the President, Chief Executive Officer, and the Chairman of the Board (or other presiding officer) of the corporate parent; and
 - b. The state and date of incorporation of the corporate parent.
- 7. Identify all current and former subsidiaries of the Company and include the following additional information about all such subsidiaries:
 - a. The name(s), address(es), telephone number(s), and email address(es) of the President, Chief Executive Officer, and the Chairman of the Board (or other presiding officer) of the subsidiary;
 - b. The state and date of incorporation of the subsidiary; and
 - c. The Company's ownership stake in the subsidiary (e.g., full, partial) and identify other owners, if any.

- 8. Identify all current and former Facilities, as the term is defined above, that generated, handled, transported, treated, stored, or disposed of any hazardous substance, hazardous waste, industrial waste, and commercial waste (as those terms are defined above) between 1960 and 1990, and provide the following additional information regarding each Facility:
 - a. The name and address of each Facility;
 - b. The RCRA I.D. number of each Facility, if applicable;
 - c. Any previously used names of each Facility;
 - d. The name, address, phone number, email address, and title of the current Facility manager and each former Facility manager of each Facility;
 - e. The dates of the Company's ownership or lease of each Facility and provide documents related thereto, including but not limited to purchase or sale agreements, deeds, and leases; and
 - f. Describe in detail the nature of the operations conducted at each Facility.
- 9. List each hazardous substance, hazardous waste, industrial waste, and commercial waste that was used, generated, handled, transported, treated, stored, manufactured, recycled, recovered, disposed of, or otherwise processed at each Facility.
- 10. Provide the following information, and all documents that support such information including waste logs, journals, manifests, or notes, regarding each hazardous substance, hazardous waste, industrial waste, and commercial waste identified in your response to Request 9 above:
 - a. The specific nature of each hazardous substance, hazardous waste, industrial waste, and commercial waste including the name, composition, its source and/or origin, and its form (liquid, sludge, solid);
 - b. Dates and monthly/annual quantity, by volume or weight, of use, generation, handling, transportation, treatment, storage, manufacturing, recycling, recovery, or disposal of at or from each Facility;
 - c. The specific manufacturing or other processes at each Facility involving each hazardous substance, hazardous waste, industrial waste, and commercial waste, and include a copy of any chemical analyses performed;
 - d. The locations where the Company sent each type of hazardous substance, hazardous waste, industrial waste, and commercial waste from each Facility for disposal, treatment, or recycling;
 - e. Identify all waste transporters used in relation to each Facility;
 - f. For each type of hazardous substance, hazardous waste, industrial waste, and commercial waste, specify:
 - i. Which waste transporter picked it up;
 - ii. How frequently each waste transporter picked up such waste;
 - iii. The volume picked up by each waste transporter (per week, month, or year);
 - iv. The dates (beginning & ending) such waste was picked up by each waste transporter;

- v. The ultimate location for each type of hazardous substance, hazardous waste, industrial waste, and commercial waste and provide all documents indicating the ultimate disposal/recycling/treatment location for each type of hazardous substance, hazardous waste, industrial waste, and commercial waste;
- vi. The individual(s) or organization(s) that selected the location to which waste from each Facility was taken and identify each such individual(s) or organization(s); and
- vii. How the Company managed pickups of each hazardous substance, hazardous waste, industrial waste, and commercial waste including but not limited to:
 - 1. The method for inventorying each type of hazardous substance, hazardous waste, industrial waste, and commercial waste;
 - 2. The method for requesting each type of hazardous substance, hazardous waste, industrial waste, and commercial waste to be picked up;
 - 3. The waste transporter employee/agent contacted for pickup of each type of hazardous substance, hazardous waste, industrial waste, and commercial waste; and
 - 4. The amount paid or the rate paid for the pickup of each type of hazardous substance, hazardous waste, industrial waste, and commercial waste.
- 11. Identify all individuals who had responsibility for the Company's environmental and waste management decisions at each Facility between 1960 and 1990 (e.g., responsibility for decisions regarding the disposal, treatment, storage, recycling, or sale of the Company's hazardous substances, hazardous wastes, industrial wastes, and commercial wastes) and provide the following additional information:
 - a. Each such individual's job title, duties, dates performing those duties, identify the supervisors for those duties, current position, and if applicable, the date of the individual's resignation or termination.
 - b. Provide the nature of the information possessed by each such individual concerning the Company's waste management.
- 12. Specify and describe each hazardous substance, hazardous waste, industrial waste, and commercial waste from the Company transported to or disposed of at the Site by, on behalf of, or in connection with the Company, and include the following information:
 - a. The name, composition, and source of origin of each hazardous substance, hazardous waste, industrial waste, and commercial waste and identify the concentrations of each hazardous substance therein;
 - b. How each hazardous substance, hazardous waste, industrial waste, and commercial waste was containerized for transportation to and/or disposal of at the Site (e.g., in drums, cylinders, tanks, bulk form, etc.), as well as the type, condition, and number of containers used for such transportation/disposal;

- c. The dates each hazardous substance, hazardous waste, industrial waste, and commercial waste was transported to or disposed of at the Site, including the volume or weight of each transported to or disposed of at the Site;
- d. What was done with each hazardous substance, hazardous waste, industrial waste, and commercial waste once it reached the Site (e.g., burned, buried, and/or transported elsewhere, etc.);
- e. The final disposition of each hazardous substance, hazardous waste, industrial waste, and commercial waste, as well as the date and location of final disposition;
- f. Identify all parties who participated in the transportation of each hazardous substance, hazardous waste, industrial waste, and commercial waste to the Site; and
- g. The Facility or other property owned, operated, or occupied by the Company from which the hazardous substance, hazardous waste, industrial waste, or commercial waste originated.
- 13. State whether the Company, including any of its current or former officers or directors, approved, authorized, discussed, or had knowledge or awareness of any arrangement to transport to or dispose of at the Site any hazardous substance, hazardous waste, industrial waste, and commercial waste.
- 14. Provide copies of all documents that refer or relate to the treatment or disposal at the Site, or the transportation to the Site, of any hazardous substance, hazardous waste, industrial waste, and commercial waste, including but not limited to waste manifests, hauling records, disposal records, descriptions of the packaging used (e.g., drums), labels/markings related to the disposal, and any characterizations or analyses of any such hazardous substance, hazardous waste, industrial waste, and commercial waste.
- 15. Describe all current and past business relationship(s) between the Company and the following entities and provide all documents, including communications, that refer or relate to the Company and each entity:
 - a. Joseph P. Brillo;
 - b. Joseph P. Brillo Industrial and Commercial Waste Removal;
 - c. Joseph P. Brillo Sanitary Sewerage Disposal;
 - d. Brillo Sewerage Disposal;
 - e. Brillo Scavenger Waste Service;
 - f. Brillo Excavating & Waste Disposal;
 - g. Any other entity that owned or operated the Site; and
 - h. Any other entity that transported a hazardous substance, hazardous waste, industrial waste, or commercial waste to the Site.
- 16. Identify any third parties which the Company has reason to believe arranged for or transported any hazardous substance, hazardous waste, industrial waste, or commercial waste to be disposed of at the Site. State the basis of that belief and provide all documents related thereto.

- 17. Has the Company been a party to any litigation or involved in any other claim where an allegation by or against the Company included environmental contamination at the Site or contamination related to any Facility? If yes, identify such litigation or claim, briefly describe the allegation by or against the Company, the status of the litigation or claim, and provide a copy of the pleadings and any settlement agreement or court order.
- 18. Has the Company been named by EPA, any New York State agency, or any local government or agency as a party responsible for environmental contamination at the Site or contamination related to any current or former Facility? If yes, state the Company's understanding of the basis for such notice of responsibility and provide a copy of any correspondence, order, or agreement between the Company and the governmental agencies.
- 19. Provide a schedule of liability insurance policies that may provide coverage to the Company for environmental liability associated with the Site.
- 20. Identify each entity that may have a duty to indemnify the Company for any potential environmental liability in connection with the Site. Identify the circumstances giving rise to the indemnity. Provide a copy of any document that reflects a requirement to so indemnify the Company.
- 21. Identify each individual, including former and current employees, who may be knowledgeable of:
 - a. the Company's operations (between 1960-1990) and practices concerning the handling, storage, and disposal of any hazardous substance, hazardous waste, industrial waste, or commercial waste;
 - b. the disposal of any hazardous substance, hazardous waste, industrial waste, or commercial waste from a Facility at the Site; or
 - c. any business relationship between the Company and any former owner or operator of the Site.
- 22. Please provide all documents, if not already requested above, that support your responses or are responsive to Requests 1 21.
- 23. If any of the documents responsive to this Request for Information are no longer available, please indicate the reason why they are no longer available. If any documents were destroyed, provide the following:
 - a. The relevant document retention policy between 1960 and the present;
 - b. A description of how the documents were destroyed (burned, trashed, etc.) and the approximate date of destruction;
 - c. A description of the type of information that would have been contained in the documents;
 - d. The name, job title, and most current address, telephone number, and email address of the person(s) who would have produced the documents, the person(s) who would have been responsible for the retention of the documents, the person(s) who would

- have been responsible for the destruction of the documents, and the person(s) who had and/or still may have the originals or copies of the documents; and
- e. The names and most current address, telephone number, and email address of any person(s) who may possess documents relevant to this Request for Information.
- 24. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any request contained herein or who may be able to provide additional responsive documents, identify such persons and specify the additional information or documents that they may have.
- 25. Identify each individual who assisted or was consulted in the preparation of the response to this Request for Information. In addition, state whether and how each such person has personal knowledge of the information in the answers provided.

REQUEST FOR INFORMATION CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION Brillo Landfill Superfund Site

State of	
County of	
documents submitted herewith, and that bas responsible for obtaining the information, I accurate, and complete, and that all docume unless otherwise indicated. I am aware that information, including the possibility of fine a continuing obligation to supplement my re	ponse to EPA Request for Information) and all ed on my inquiry of those individuals immediately believe that the submitted information is true, nts submitted herewith are complete and authentic there are significant penalties for submitting false and imprisonment. I am also aware that I am under esponse to EPA's Request for Information if any re addressed in EPA's Request for Information or my
	COMPANY (print or type)
	NAME (print or type)
	TITLE (print or type)
	SIGNATURE
	Sworn to before me this
	day of 202 Notary Public